

June 14, 2016

Hon. William H. Pauley III
US District Court
500 Pearl St
New York, NY 10007

RE: U.S. v. Capers, et al 15 cr 607 (WHP)

Dear Judge Pauley:

I am counsel for Marquise Rochester in the above-captioned case. I write on behalf of all defense counsel to respectfully request a three-week adjournment of the current motion schedule. The government has no objection to this request.

Defense motions on this matter are due tomorrow, June 15, 2016. This Court previously granted an application by Kelly Sharkey, counsel for Christian McKnight, dated June 9, 2016 (docket entry # 66 and 67) to extend the filing deadline to July 6, 2016, and a similar request by Jeffrey Pittell, counsel for Edwin Moye, is currently pending (docket entry #68). Plea negotiations are currently ongoing, and the additional three weeks may obviate the need for motion practice for some or all defendants.

For the foregoing reasons, we respectfully request an adjournment until July 6, 2016 for defense motions.

Thank you for your kind attention to this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sarah Kunstler', with a stylized flourish at the end.

Sarah Kunstler

cc: All counsel of record (ECF)